STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Joint Submission for Arbitration Per   )
the Amended Plan of Record For   )   Docket No. *00-0592*
Operations Support Systems ("OSS")   )

COMMENTS OF AMERITECH ILLINOIS

I. Introduction and Summary

This case is being presented to the Commission for arbitration pursuant to

Condition 29 of the Commission's September 23, 1999, order in Docket 98-0555

approving the merger of SBC Communications, Inc. and Ameritech Corporation

("Merger Order"). Condition 29 deals with the implementation of a "comprehensive plan

for approving the [operational support systems] OSS systems and interfaces available to

[competitive local exchange carriers] CLECs in Illinois."[1] Specifically, Condition 29

requires Ameritech Illinois to deploy application-to-application interfaces for OSS and

graphical user interfaces ("GUIs") for OSS that support pre-ordering, ordering,

provisioning, maintenance and repair, and billing for resold services, individual

unbundled network elements ("UNEs") and combination of UNEs in accordance with a

three-phase schedule.[2]

Ameritech Illinois, Commission Staff, and participating CLECs are now at the

end of the Phase II collaborative process, and disputed issues are to be submitted to the

Commission for arbitration. Twenty issues are being submitted to the Commission for

resolution. Of the CLEC demands associated with these issues, not one is necessary to

insure the health of the competitive local exchange environment in the State of Illinois.

The bulk of the issues in dispute can be placed into two categories:

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[1] Merger Order at 253.
[2] See Section II, *infra.*

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1) issues which have been the subject of substantial negotiations but, with respect to which, the CLECs express no interest in compromise; and 2) issues with respect to which agreement has been reached on what should be done, but which CLECs insist on implementation earlier than Ameritech Illinois can provide -- i.e. timing issues.

Fulfilling the CLECs' wish lists in these two categories would involve the commitment of substantial resources—resources that are already strained in an effort to effect the OSS interface and process modifications that have already been agreed to by the parties. The inter-relatedness of OSS systems and processes across multiple states, coupled with SBC/Ameritech's obligation to move toward thirteen-state uniformity, complicates the task significantly. In many instances, especially those involving demands for accelerated implementation, it is impossible to fulfill the request because of the complexity of the work, the numbers of systems involved and the sequencing of tasks that must be done to effect the result. Those situations are more fully explained below.

Moreover, the Commission must regard requests for accelerated implementation as unauthorized by the Merger Order. Condition 29, clearly provides for an implementation period, Phase III, that last for twelve months after the end of the Phase II. The Commission considered the length of the Condition 29 timetable and shortened the original proposal,[3] yet specifically afforded Ameritech Illinois a full year to implement the OSS changes after those changes have been finalized by a Phase II agreement or arbitration. Ameritech Illinois' proposed timetable is in keeping with this requirement. In fact, for the most critical and substantive OSS changes, Ameritech's proposed schedule is much more generous to the CLECs than the requirements of Condition 29. Specifically, Ameritech Illinois scheduled the vast majority of changes desired by the

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[3] Merger Order at 195.

CLECs to be implemented in its March, 2001, release.[4]   That date was set when it was originally expected that it would be twelve months after the end of Phase II. As the timeline extended for various reasons, Ameritech Illinois did not extend the implementation date for this release despite the significant risks associated with compressing the time between the finality of the end of Phase II and the release itself. The CLECs' timing requests are nothing more than requests to further compress the specified Phase II twelve-month timeline and thus should be rejected out of hand.

A small group of remaining issues can be placed into one of two other categories: 1) issues of principle, which go to the very heart of the collaborative process envisioned by the Commission; and 2) product issues which are beyond the scope of this proceeding.

None of these issues--in either of these categories--should be viewed in isolation from each other or in an Illinois-specific vacuum. Rather, Ameritech Illinois' position with respect to issue must be considered to be reasonable in light of the "big picture" -- i.e., the inter-relatedness of systems across the SBC/Ameritech thirteen-state service area, the commitments made by SBC/Ameritech to develop and deploy uniform, electronic OSS throughout that thirteen-state service area, and the commitments made by SBC/Ameritech to improve OSS interfaces and processes in the federal arena and other jurisdictions, all of which will inure to the benefit of CLECs in Illinois. Thus, for example, the CLECs' demand to have Ameritech Illinois implement an ordering graphical user interface prior to the March release might not seem to be an unreasonable request at first glance. It would seemingly make it easier to place orders for those carriers who are not "electronically bonded" with Ameritech Illinois for ordering

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[4] See Amended Plan of Record ("Amended POR") submitted with the parties joint petition in this proceeding at Section III.

purposes.[5] Yet, as further described below, the work necessary to implement the GUI is complex and substantial. Indeed, when this issue was escalated to the highest management levels in the SBC/Ameritech organization, it was determined that, with all the other work needed to be done on agreed-to OSS changes, it was impossible to advance the release.

Moreover, the inevitable CLEC claims that the failure to grant each request will have dire results in the competitive marketplace in Illinois must be carefully scrutinized. Certainly, it is easy enough for CLECs to make conclusory claims that the lack of this or the presence of that will delay carriers' entry into the local market or substantially hinder their ability to compete once they are there. Yet, those claims must be tested against the facts and common sense. For example, the absence of the full ordering GUI until March, 2001, cannot reasonably be claimed to significantly affect competition in Illinois, given the substantial numbers of orders already being placed electronically and given Ameritech's offer to fund an "interim" GUI solution starting in October.

Ameritech Illinois respectfully submits that a proper analysis of these issues will show the CLECs' remaining demands to be unreasonable, particularly when considered in light of the accommodations already made by Ameritech Illinois for the benefit of Illinois CLECs. As demonstrated below, the CLEC demands will have a negligible be impact, if one at all, on competition in this State.

II.   Background

A.   Condition 29

Illinois Merger Condition 29 requires Ameritech Illinois to deploy application-to-application interfaces and GUIs for OSS. The FCC, in its Local Competition First

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[5] See Issue #19, *infra.*

Report and Order, [6] concluded that five specific operational support systems (OSS) function--pre-ordering, ordering, provisioning, maintenance and repair, and billing for unbundled network element ('UNEs") and resale--must be unbundled on request under the requirements of Section 251(c)(3) of the Federal Communications Act of 1934, as amended (the "Act")[7]. Consistent with the underlying theme of access to the five specific OSS functionalities, Condition 29 requires Ameritech Illinois to deploy standard interfaces "for OSS that support pre-ordering, ordering, provisioning, maintenance and repair, and billing for resold services, individual UNEs, and combination of UNEs."[8]

Pursuant to Phase I of Condition 29, Ameritech Illinois has already articulated, in a Plan of Record ("POR"), an overall assessment of SBC's and Ameritech's existing OSS interfaces, business and processes and rules, hardware and data capabilities and differences (the present method of operation) ("PMO"), as well as their plans to deploy application-to-application and GUI interfaces for OSS and for integrating OSS processes (the future method of operation) ("FMO"). After comment and revision, that POR was submitted to the Commission and approved in the Commission's order of April 5, 2000, in Docket 00-0271.

In Phase II, Ameritech Illinois, the Commission Staff, and CLECs have met in sessions that were voluntarily extended several times beyond the four weeks articulated in Condition 29 itself. The purpose of these collaborative meetings was to obtain written agreement "on OSS interfaces, enhancements, and business requirements identified in the Plan of Record"[9] and "[a]ny issue related to OSS systems and or OSS processes."[10]

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[6] *In The Matter Of Implementation Of The Local Competition Provisions In The Telecommunications Act Of 1996, CC* Docket No. 96-98, first report and order, FCC 96-325 (released August 8, 1996) 11FCC Rcd 15499 ("Local Competition First Report and Order").
[7] *Id.* at ¶¶ 516-520.
[8] Merger Order at 253-255.

[9] Merger Order at 254.
[10] April 5, Order at 8.

Approximately ninety seven issues rose to a level of significance sufficient to be tabulated separately by Staff in the collaborate process. Many more minor issues and questions were discussed and resolved. Of these ninety seven, a number were rejected (largely on the grounds of duplication) and a handful (mostly involving joint testing) were deferred. The majority of the issues, however, were resolved by a negotiations between the parties. The balance, some twenty issues, are still in dispute and being presented here for resolution. As the "written agreement" required in Phase II, Ameritech has amended its POR, where appropriate, to reflect resolutions of issues achieved in this collaborative, as well as to reflect commitments made by SBC/Ameritech in other jurisdictions that effect Illinois.[11] That Amended POR also is being jointly submitted by the parties to this Commission.

Phase II, also contemplates an arbitration by the Commission to resolve issues that are still in dispute at the end of the collaborative process. Those issues are being submitted to the Commission today. Phase III of the process is a twelve-month implementation period, which begins immediately for those items of agreement but, for disputed items, the time commences after the arbitration decision is issued.

It should be noted that a focus of Condition 29 is the development of OSS interfaces in the integration process that is taking place across the SBC/Ameritech service area subsequent to the merger. Condition 29 specifically requires that the POR filed by Ameritech Illinois include discussion of the differences between SBC's and Ameritech's OSS interfaces and the companies' plan for integrating their OSS processes.[12] That integration is under way as part of a condition imposed by the FCC on its approval of the SBC/Ameritech merger.[13] In fact, one of the charges to Staff in this proceeding is to

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[11] See Sections II.B, II.C, *infra.*
[12] Merger Order at 253-254.
[13] See Section II.B, *infra.*

"closely monitor the FCC's OSS integration process" and to "specifically advise the Commission as to …the advisability of opting into the FCC process."[14]

B.   Federal Proceedings

The FCC's Order approving the SBC/Ameritech merger[15] imposed several conditions relative to OSS.

First, SBC/Ameritech must develop and deploy enhancements to existing OSS interfaces to support pre-ordering and ordering of components used to provide digital subscriber lines ("DSL") and other advanced services.[16] A three-phase process is required, including a collaborative Phase II process similar to that contained in Condition 29. Second, SBC/Ameritech is required to develop and deploy "uniform, electronic OSS throughout the 13-State SBC/Ameritech Service Area."[17] This also involves a three-phase process with a collaborative. Third, SBC/Ameritech is required to negotiate with interested CLECs "a uniform change management process for implementation in the SBC/Ameritech Service Area" -- "to facilitate communication about OSS changes, new interfaces, and retirement of old interfaces, as well as the implementation of time frames which includes such provisions as a twelve-month developmental review, release announcements, comment and reply cycles, joint testing processes and regularly scheduled change management meetings."[18]

In addition, SBC/Ameritech is required to provide direct access to their order processing systems for resold local services and to develop and deploy enhancements to the existing interfaces for OSS that supports maintenance/repair of resold local services.[19] Also, SBC/Ameritech is required to develop jointly with CLECs and to deploy "either (i)

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[14] Merger Order at 195-197.

[15] *In re Applications of Ameritech Corp. and SBC Communications, Inc.,* CC Docket No. 98-141, Memorandum Opinion and Order, FCC 99-279 (released October 8, 1999) ("FCC Merger Order").

[16] FCC Merger Order, Appendix C at ¶ 15-16.

[17] Id. at ¶¶ 25-28.

[18] Id. at ¶ 32.

a software solution that shall ensure that CLEC-submitted local service requests are consistent with SBC/Ameritech's business rules, or (i) uniform business rules for a completing CLEC local service requests..."[20] This latter requirement also involves a three-phase process.

To date, the bulk of the work at the federal level by both SBC/Ameritech and collaborating CLECs has involved the Advanced Services and Uniform and Enhanced OSS requirements.

In connection with Advanced Services OSS, SBC/Ameritech filed its initial Plan of Record late last year and six CLECs responded with comments. Phase II of the process began with a collaborative meeting on January 19, 2000, which resulted in the resolution of fifteen operational and technical issues. A second round of collaborative meetings was held on February 1-2, 2000, which resulted in a resolution of an additional eleven issues. At the request of the parties, the FCC granted an extension of time to enable the continuation of the collaborative process. A final round of collaborative discussions was held on March 29-30, 2000; and a number of conference calls followed these meetings. On April 4, 2000, the SBC/Ameritech final (POR) and a list of seven unresolved issues were submitted to the FCC.

With respect to the Uniform and Enhanced OSS requirements, SBC/Ameritech submitted its POR to the FCC on March 7, 2000. Phase II collaboration began on April 10, 2000. Discussions took place in different venues on fifteen days during April and early May addressing over two hundred and fifty issues raised by the CLECs. During that time, the vast majority of the issues were resolved. The collaborative sessions were extended twice by the FCC and concluded on May 19 with the submission by SBC/Ameritech of a revised POR incorporating language upon which SBC/Ameritech

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[19] Id. at ¶¶ 29-30.

and CLEC reached agreement during the collaborative process, together with a list of remaining unresolved issues. SBC/Ameritech and the CLECs continued their dialogue throughout the summer and, on August 8, 2000, SBC/Ameritech submitted to the FCC a further revised POR incorporating all the changes agreed to since May 19. SBC/Ameritech also submitted a revised CLEC OSS issue list which indicated the disposition of more than two hundred and fifty issues raised by the CLECs during the collaborative sessions, and a list of the seven remaining unresolved issues (or categories of issues) in dispute.

With respect to the FCC's change management process ("CMP"), SBC and the CLEC representative of the Drafting Team have been meeting in numerous sessions since November, countless issues were discussed and resolved. The result is a near-final document included as Attachment A to the Amended POR with literally one issue in dispute.[21]

C.   State Proceedings

Earlier this year, the Wisconsin Public Service Commission ("WPSC"), opened Docket 6720-TI-160, entitled "Investigation into Ameritech Wisconsin Operational Support Systems". It is a contested case and the WPSC has directed the parties (Ameritech Wisconsin and interested CLECs) to participate in a series of pre-hearing conferences to identify OSS issues and to attempt to reach agreement on as many substantive issues as possible. The Commission directed the parties to meet as often as possible in their attempt to reach an agreement and to complete their meetings by September 30. As one would expect, there is overlap between several of the issues raised in the Illinois collaborative and those being dealt with in Wisconsin--e.g. hot cuts, directory listing, and the availability of an ordering GUI. In addition, proceedings that

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[20] Id. at ¶ 31.

have been opened in Michigan, Ohio, and Indiana dealing with Section 271 of the Act (requirements for Ameritech entry into long distance) have collaborative sessions to deal with OSS issues in general and third-party OSS testing. Significant efficiencies have been achieved in these proceedings by pointing to the results of the collaborative discussions that have taken place in Wisconsin.

The Commission has acknowledged the federal activity and expressed its concern that the required integration process "not have an adverse effect on competition in Illinois."[22] Nonetheless, the demands of the federal integration process as well as the resources required to accommodate the demands of CLECs articulated in OSS proceedings in multiple jurisdictions must factor into the Commission's evaluation of the CLECs' demands in this proceeding. In other words, while the Commission must ensure an even playing field, demands placed by CLECs on the thirteen-state integration process and OSS-related activities in the other Ameritech states place significant constraints on Ameritech Illinois' ability to say an unqualified "yes" to every CLEC request in Illinois. When viewed from this perspective, Ameritech's positions on the disputed issues must be deemed reasonable especially where, as here, those positions have no adverse impact on competition in the local market in Illinois.

III. Disputed Issues

Following is a presentation of Ameritech Illinois' case on each disputed issue submitted to the Commission for resolution. For ease of reference, Ameritech Illinois has numbered the issues consistent with those numbers assigned by the Commission Staff in the collaboratives.

Issue #1: Application Versioning:

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[21] See Issue #4, *infra*

[22] Merger Order at 196.

Should the Commission require Ameritech Illinois to make application versioning available prior to the scheduled March, 2001, technical release?

Versioning is the process by which Ameritech Illinois will support three versions of software at all times for its Electronic Data Interchange (EDI) Ordering and EDI/CORBA Pre-Ordering application-to application (app-to-app) interfaces. App-to-app interfaces require the Competitive Local Exchange Carriers (CLEC) to develop an interface on its side (or acquire the services of an authorized Service Bureau Provider (SBP)) to exchange information with an Incumbent Local Exchange Carrier (ILEC). The primary reason for versioning is to allow the CLEC to choose between moving to a new release at the same time as the ILEC or to remain on the existing release until it is retired.

There are primarily two types of releases that will affect versioning. One is a Local Service Ordering Guidelines (LSOG) release. The LSOG is a document produced by the Order and Billing Forum (OBF) at a national level. These are the industry-defined guidelines for the Operations Support Systems (OSS) made available to CLECs for the exchange of information with the ILEC. LSOG releases are usually done at a rate of one every six months to one year. Each LSOG release is numbered in sequence, the latest being LSOG 4.

The second type of release is a "dot" release. These are releases done between LSOG releases and are identified sequentially. Therefore, as an example, the first release after the implementation of LSOG 4 would be identified as LSOG 4.1.

Versioning is a complicated, time and resource-laden undertaking. It requires the development, testing and implementing of an EDI/LASR that primarily duplicates the existing EDI/LASR environment. For example, if one were to take a single engine propeller-driven airplane and decide to upgrade it to a twin-engine plane, it would require

a full redesign, including moving the engines to the wings, replacing the nose section, changing the wing support and rebuilding the infrastructure to support the new design.

In March, 2001, Ameritech Illinois will implement versioning coincident with releases of LSOG 4 ordering and pre-ordering interfaces. In fact, attempting to move versioning forward by just several months could jeopardize Ameritech Illinois' ability to make versioning available for LSOG 4 that the CLEC s will get in March 2001. The balance clearly leans in favor of not adjusting the current schedule.

SBC implemented versioning in Pacific Bell and Southwestern Bell on August 12, 2000. It was the first such experience for SBC and, although it took multiple discussions with the CLECs and numerous iterations of the requirements over the past year, SBC has successfully deployed versioning. With the experience SBC now has with versioning, SBC will be able to meet its commitment in Ameritech Illinois to deploy versioning with the March, 2001, release. As noted, versioning requires significant time and resource effort. The versioning effort currently underway is tied to LSOG 4. To design, create and build versioning for a December, 2000, release is not feasible in the time remaining. If Ameritech Illinois were required to implement versioning earlier than the March, 2001, release it would require Ameritech Illinois to re-direct the same resources and time being used to develop the LSOG 4 March, 2001, release. The only release planned in the short time between now and the implementation of versioning in March 2001 that has CLEC coding impacts is the December 2000 release, and that is not a large or significant release. Work has already begun to build versioning in support of the LSOG 4 release scheduled for March 2001. At that time, CLECs can choose to remain on the current of LSOG or move to LSOG 4.

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Ameritech Illinois has committed to implement in EDI ordering and EDI/CORBA pre-ordering with the March of 2001 release in the FCC Uniform and Enhanced OSS Plan of Record (POR):

> SBC will support three versions of software at all times for its EDI Ordering and EDI/CORBA Pre-Ordering interfaces. The last dot release of the retired LSOG will be supported until the next LSOG is implemented. The other two versions supported will either be the latest two dot versions or in the case of initial implementation of an LSOG, the new LSOG and the next to last dot release of the retired LSOG. Sunset of the oldest LSOG will occur on the implementation date of the newest LSOG version.[23]

And in the Ameritech Illinois OSS Plan of Record:

Versioning will be implemented by Ameritech Illinois coincident with the March 2001 ordering and pre-ordering releases. Ameritech Illinois will support three versions of software at all times for its EDI Ordering and EDI/CORBA Pre-Ordering interfaces. The last dot release of the retired LSOG will be supported until the next LSOG is implemented. The other two versions supported will either be the latest two dot versions or in the case of initial implementation of an LSOG, the new LSOG and the next to last dot release of the retired LSOG. Sunset of the oldest LSOG will occur on the implementation date of the newest LSOG version.

It is undisputed that versioning allows the CLEC time to code for changes at its own pace and enhances a CLEC's ability and Ameritech Illinois' to test its coding on a non-flash cut basis. Ameritech Illinois believes it has gone farther than any other ILEC in committing to support three versions of its EDI interface. To attempt to move up the current schedule would not accomplish anything except the potential delay of the March, 2001, release that will implement versioning to a changed industry standard.

Issue #2: Joint Testing

Should the Commission require Ameritech Illinois to make additional modifications to the joint testing environment that will be made available in March, 2001.

Ameritech Illinois has offered language in the Plan of Record (POR) that describes the Ameritech Illinois – CLEC Joint Testing process. Joint testing is a process applicable to changes to application-to-application, pre-ordering, ordering and trouble administration interfaces. The joint testing that will be rolled out in Illinois in March 2001 is the same in all essential aspects as the testing process in Texas. The FCC stated in the Texas 271 Order:

> We conclude that SWBT's test environment affords competing carriers an adequate opportunity to test SWBT OSS changes prior to implementation. We, therefore, find that the testing environment SWBT makes available provides competing carriers with a meaningful opportunity to compete. Specifically...SWBT's testing environment is stable, adequately mirrors the production environment, affords competing carriers an opportunity to develop test decks of representative pre-ordering and offers the extended testing periods that competing carriers need for EDI implementation and new release testing. [Texas 271 Order, paragraph 134.]

The joint testing language has been enhanced throughout the FCC and Illinois POR negotiation process to clarify issues key to the CLECs. Meetings and conference calls between the CLECs and Ameritech Illinois were held to understand issues and refine wording. These issues included the following.

First, there is language specifically explaining that the test environment is a mirror of production. The POR states that joint testing:

> "...employs a stable test environment, which mirrors the production, environment through creation of the service order. The test system will utilize a duplicated copy of the production systems in an environment that is simultaneously updated to incorporate production table changes."

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[23] *Uniform and Enhanced OSS Plan of Record*

When Ameritech Illinois states that the test environment mirrors production it means that all programs, data base structures, tables, etc. are exactly the same as those on the production environment. No development work is performed on the platform. Code development and internal testing for new functionality is performed on a separate development platform. The joint testing environment is treated just like a production environment. The environment mirrors the entire production ordering process. A Service Order Completion (SOC) can be returned upon request for testing of that functionality in the proposed test environment.

The CLECs have expressed concern in their joint issues list over alleged discrepancies between the joint testing, and the production process. They declined to identify these alleged discrepancies or their alleged materials. Ameritech Illinois believes that its joint testing process that will be rolled out mirrors production.

Second, there is language specifically clarifying the use of the test environment for both major releases and start-up testing/other CLEC initiated testing.

The POR states:

> "The test environment will also be available for CLEC turn-up testing and for other CLEC testing between releases. This testing is to be negotiated between Ameritech Illinois and the CLEC that wishes to test. A generic test plan template is available."

The CLECS expressed concern that the production environment might differ for a CLEC-initiated test. As the above language indicates, the environment for CLEC-initiated testing is the same.

Third, a compromise position was offered on the inclusion of a "non-monitored" test timeframe in each release test window to address the desire of some CLECs to use the test window without the benefit of monitoring by Ameritech personnel.

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The POR states:

"Test cases will be monitored while being processed in order to provide CLEC prompt feedback on test results. Ameritech Illinois will make a limited window available for automatic processing of test orders. As a guideline, for release testing, this window will account for no more than 10% of the total test window and may be increased, decreased and set through the PORCMP."

The FCC in its approval of the SBC Texas 271 application (paragraph 138) stated that the monitored test approach is in no way a hindrance to CLEC testing. It is an aid to the CLECs that many smaller CLECs in SWBT territory support. It offers Ameritech Illinois testing staff the ability to respond more quickly to CLEC questions or issues as well as to offer consulting or input on alternative approaches. It also allows Ameritech Illinois to assess if issues are related to the system or software and expedites resolution of potential problems.

Fourth, the POR includes language for pre-orders which provides that all pre-order functions are available for testing in the environment. The POR states:

"These systems will allow for testing of each pre-order function in a manner that utilizes production data. Standard test cases will be provided for each function."

Fifth, to the extent that issues may remain as to when joint testing becomes available, the initial uniform OSS release (scheduled for March 2001) will include a 60-day test window. Thereafter, it will be a 30-day test window.

The CLECs have failed to present a business need that justifies an extended window on an ongoing basis. More often than not, CLECs have not been ready to begin testing at the commencement of the 30-day test window. In many cases, they do not begin testing until the final two weeks before the release. CLECs have not demonstrated a need for doubling the test window currently offered.

The 60 day request for subsequent releases, if granted, would also seriously impact what can be delivered in the 6-month releases. It removes 30 days of development and testing time from Ameritech Illinois that could be used to design, program and test items that provide added functionality to CLECs. The list of items requested through the Change Management process is lengthy. Added time while a release sits idle waiting for testing that is unlikely to occur given past testing patterns, seems to work against the CLEC and Ameritech Illinois goals for timely delivery of additional functionality.

Most importantly, with versioning, the need for extended test windows is no longer needed. With versioning, CLECs who are not ready to conclude testing in the planned 30-day joint testing window can remain on the previous version until they are ready to conclude their joint testing and move into production. Ameritech Illinois has offered to maintain three versions simultaneously. There is no longer any reason for CLECs to not be able to maintain a progression to new versions in the timelines that will be provided.

Issue #4: Change Management - OIS:

Should the Commission prohibit a quorum requirement for CLEC voting on Outstanding Issue Resolution in the context of the Change Management Process?

In the current draft of the Change Management Process ("CMP") agreed to by the parties,[24] contains provisions by which CLECs can call for a vote to delay a technical OSS-related release. Ameritech Illinois believes that that a quorum of some minimum number of "qualified" CLECs (as explained below) should be required to ensure the "collaborative" nature of the CMP. Contrary to the CLECs' claim, it is the CLECs, not Ameritech Illinois, who have changed positions on this issue.

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[24] See Amended POR at 3 and its Appendix A.

Background

An integral part of the process of introducing new or changing existing OSS

interfaces and processes is the involvement of CLECs in a meaningful way. The FCC's

merger conditions recognize the need for such a change management process ("CMP")

and require SBC/Ameritech to negotiate with CLECs concerning a uniform CMP

applicable throughout the 13-State SBC/Ameritech service area.[25] The FCC defines

CMP as:

> the documented process that SBC/Ameritech and CLECs follow to facilitate
> communication about OSS changes, new interfaces and retirement of old
> interfaces, as well as the implementation timeframes: which includes such
> provisions as a 12-month developmental view, release announcements, comments
> and reply cycles, joint testing processes and regularly scheduled change
> management meetings.[26]

Those 13-State CMP negotiations have been taking place since November. The result

has been a near-final document that is included as Attachment A to the amended POR

that was filed with the Joint Petition in this proceeding.

The CMP provides milestones and a timeline for the change process (for

"releases"), for both application-to-application interfaces and GUIs, including Release

Announcements, Initial Requirements, Walk-through (discussion) of Initial

Requirements, CLEC comment periods, SBC/Ameritech comment periods, Final

Requirements, CLEC joint testing, and Implementation. The CMP also specifies release

requirements content criteria, the process for Outstanding Issue Solution ("OIS"), the

exception process, Points of Contact, versioning, and requirements for posting legacy

system changes. It is a portion of the OIS that is in dispute here.

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[25] FCC Merger Approval Order, Appendix C at ¶ 32.
[26] *Id.*

The OIS is a mechanism for resolving disputes which includes the ability of a qualified CLEC to call for a vote in which Ameritech Illinois would not participate. An OIS would come about after a several-month process that would include notifications, comment periods, and discussions in walk-throughs and CMP meetings. OIS vote can be invoked by a CLEC at several points in the CMP (as documented in Amended POR Attachment A) as follows:

- Category One – Changes to Hours of OSS interface Availability
- Category One - Changes, Final Release Requirements (Step 3.3.6.4)[27]
- Category One - Changes, Release Implementation (Step 3.3.7.4)
- Category One - New Interfaces, Final Release Requirements (Step 4.2.4.4)
- Category One - New Interfaces, Release Implementation (Step 4.2.5.2)
- Category Two - Changes, Final Requirements (Step 3.5.3.3)
- Category - Two New Interfaces, Final Release Requirements (Step 4.3.3.3)
- Retirement of Interfaces (Section 5.2.4)
- Emergency Situations (Section 6.2.5)
- Joint Testing (Section 6.6.4)

An OIS vote could result in the delay of a release, the redesign of a requirement(s), or the delay in the introduction or retirement of an interface. A go/no-go vote would take place after CLEC joint testing of a release and prior to release implementation. If a CLEC feels the release software has defects or is not stable, it could request a vote to determine if the release should be delayed until the code is fixed.

"Qualified" CLECs may participate in an OIS vote. The CMP (Section 7.4) provides the criteria for qualified CLECs for each type of OIS. For example, in order to qualify to vote in an OIS on an EDI ordering release implementation (go-no/go) a CLEC must have tested for the release in question, and be in production with at least 30 EDI transactions in the previous month.

History

Even before the 13-State collaborative, however, there were significant developments in the area of CMP. In 1998, the CLECs and Pacific Bell negotiated a CMP, which has been used as the foundation for the pre-Ameritech merger negotiations for a 7-SBC State CMP (SWBT, PB and NB) and then for an 8-SBC State CMP (including SNET). The negotiated CMP in California was approved by the California Public Service Commission ("CPUC") on November 4, 1999, (Decision 99-11-026) in its OSS investigation docket (I.97-10-017; R.97-10-016). The CMP was submitted to the CMP was submitted to the CPUC in a Joint Stipulated Agreement which was signed by AT&T as the representative of the participating CLECs. In the CMP, the CLECs agreed to a quorum requirement for OIS voting which constituted two-thirds of qualified CLECs.

In 1999, CLECs and SBC began a 7-state (SWBT, PB and NB) CMP negotiation effort to reach a common document. Prior to reaching agreement on a 7-State CMP, then-existing SWBT Change Control Process ("CCP") was modified to allow for a go/no-go vote. The Texas Public Utilities Commission ("TPUC") was instrumental in assisting the CLECs and SWBT to reach agreement on a quorum for holding the vote. In its Docket No. 19000 dealing a particular CMP release in the context of with SWBT interconnection agreements with AT&T and MCI, the TPUC ordered a quorum of 50 % qualified CLECs for a go/no-go vote. The Presiding Officer found that "a quorum requirement is reasonable to avoid a situation where a disproportionately few CLECs can determine the implementation of a new release."[28]

The CMP filed in Texas in the fall of 1999, complete with its quorum voting requirement, was reviewed and favorably received by the FCC in its analysis of the

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[27] Category One changes are "Gateway" changes; Category Two changes are "GUI" changes. Changes in hours of availability are considered Category One changes for process purposes.

[28] See Order No. 16 included herewith as Attachment A.

competitive environment in Texas for the purpose of determining whether SBC had satisfied the statutory pre-requisites to being permitted to offer in-region interLATA service in that state.[29]

After the SBC-SNET merger, a team of CLECs and SBC worked on an 8-SBC State document and shared it with CLECs in all SBC regions. There were no major changes requested by CLECs when the 8-State plan was shared in these regional CMP meetings. This plan called for a 50% quorum of all qualified CLECs.

The Issue

As noted above, beginning in November, 1999, SBC/Ameritech and the CLEC representatives of the 13-State Drafting Team began work on the 13-State CMP document as required by the FCC's merger conditions. During these negotiations, both SBC/Ameritech and CLECs made concessions on issues. SBC/Ameritech made substantial concessions, including "versioning" that supports 3 versions of its order and pre-order software, something that no other ILEC has agreed to do. This will require hours of extra coding for each release.

All parties were targeting July 14, 2000, as the implementation date for the 13-State CMP. On June 30, AT&T submitted suggested wording changes for Section 7, on Outstanding Issue Solution (OIS). At that time, there were no other unresolved issues. The disputed language is in Section 7.5.1 of the current draft CMP.[30] AT&T proposed that the IOS voting requirement for a 50% quorum of qualified CLECs be eliminated. AT&T's position is that a simple majority of qualified CLECs on the call determine the vote. CLECs have expressed a concern that, in a 13-State environment, it would be difficult to gather a quorum together for a vote.

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[29] See FCC Texas 271 Order at ¶110 et seq., esp. ¶116 and 130.

On July 7, SBC/Ameritech informed the CLECs that it could not support AT&T's suggested change on the issue of voting. For reasons articulated below, a "quorum" is beneficial for all parties, to work though concerns about a release in a collaborative context. The Drafting Team had several calls and face-to-face meetings on the subject of voting. Recognizing the CLECs' concerns regarding the difficulty of getting a quorum in a 13-State environment, SBC/Ameritech proposed modified language requiring a quorum of either 50% of qualified CLECs or a minimum of 8 qualified CLECs, whichever is less. SBC/Ameritech believes that a 50% quorum or a minimum of at least 8 CLECs is a reasonable and achievable number in based on current CLEC participation levels in the various SBC/Ameritech regions today. CLECs rejected the compromise offer.

Importance of a Quorum

A proper analysis of the issue in dispute must look at the CMP as a continuation of the collaborative process established in Condition 29. In that model, Phase II uses a collaborative process to determine what must be done (in the future) with respect to OSS interfaces and processes. Phase III simply involves the implementation of the results of Phase II. However, the details of all the changes that might be appropriate in the future can't be known at this time with sufficient certainty to be included in the written agreement that ends Phase II. That is why the FCC, in the context of dealing with OSS issues in its merger order, specified the importance of establishing a collaborative process to deal with change – the CMP. Even though the formal collaborative discussion of changes in OSS interfaces and processes ends in one sense with the close of Phase II, it will continue in the form of the Change Management Process -- discussions are held, and

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[30] Attachment A to the Amended POR.

if a CLEC believes it is necessary, a go/no go can be called -- a vote in which Ameritech Illinois does not participate.

As important as the vote itself is in the process, probably more important is the discussion. Prior to the vote, a dialog of opposing views takes place, including a discussion of the impacts of a "no" vote on the remainder of a release or other connected release impacts that might not be readily apparent for the vote notice itself.[31] These are subjects that are at the very core of the collaborative model. That is why it is important, and pro-competitive that a minimum number of CLECs be present for the discussion– so that the decision on a "no go" vote called by a CLEC can be an informed one and, at least in some way, representative of the CLEC community that it will affect. It should be noted that any decision coming out of an OIS will affect any CLEC user of the interface in question, and that the 8 minimum number offered by SBC/Ameritech represents only about 20-25% of eligible CLECs based on today's count of users.

Quorums exist in other contexts for the same reason. A decision that might have significant effect, should have the participation of some minimum number of decision makers to ensure that the issues have been given appropriate consideration and that the resulting decision is somewhat representative of the interests of the constituency of the deciding body.

CLECs have expressed a concern about not knowing the number of qualified CLECs on a given issue and, therefore, not being able to determine what number of CLECs are necessary for a quorum or whom to solicit for a quorum. (In the normal course, notices of the OIS would be sent to CLECs by Ameritech Illinois (or by SBC/Ameritech in the 13-State context).[32]) Ameritech Illinois submits that, in most cases, its suggested alternative of 8 minimum carriers (if it is less that 50%) solves that

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[31] See CMP Draft sec. 7.3.1.

problem. Moreover, Ameritech Illinois will agree to circulate a list of qualified carriers who have agreed to have their identities made known. Also, Staff could be involved in a manner similar to that suggested in the TPUC order – either in contacting the qualified carriers – or at least in examining the list and reporting the number that would constitute a quorum.

In summary, the Commission should find that Ameritech Illinois proposed quorum requirement for CMP OIS voting is reasonable.

Issue #6: OSS System Interface Availability:

Should the Commission order Ameritech Illinois to make ordering and maintenance and repair interfaces available 24 hours a day, 7 days a week, and pre-ordering interfaces available at the same time as ordering interfaces?

The hours of system availability are defined as those hours that Ameritech Illinois can guarantee the operational support systems (OSSs) will be available for use by the CLECs. The hours of system availability as specified by Ameritech Illinois in the Amended POR for pre-ordering, ordering and maintenance & repair hours are in dispute by the CLECs.

Ameritech Illinois is committed to providing electronic access to pre-ordering, ordering and maintenance & repair in parity with retail operations. It is important to note that since both Ameritech Illinois' wholesale customers and its retail operations draw their electronic resources from the same primary OSSs, they are equally subject to back-end OSS availability.

There appears to be a fundamental misunderstanding by the CLEC of the Ameritech Illinois system availability issues and specifically its system architecture.

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[32] See CMP Draft sec. 7.1.3.

Ameritech Illinois has actively worked to simplify access to its systems and functionality by placing multiple systems and capabilities under three primary interfaces. Those interfaces are: 1) **TCNet**, a graphical user interface, where the vast majority of the pre-order information can be found; 2) an application to application interface, where **EDI, (Electronic Data Interchange)** is utilized to enable wholesale customers to perform both pre-order and ordering functions; and 3) **EBTA, (Electronic Bonding Trouble Administration)** which provides access to maintenance and repair functions. It is important to note these three interfaces are gateways that provide access to systems as opposed to the systems themselves. Overall these interfaces provide security; structure, user tools and instructions as well act as an interpreter that communicates in a variety of technical languages and protocols with the multiple back-end systems. These interfaces are generally newer in design and structure than the systems they provide access to and, therefore, have far less requirement for maintenance, upgrades, etc. – those things that require that the system be "taken down". Though these interfaces may be active or "up", they are still limited in what they can perform due to the availability of the back-end systems.

It is completely inappropriate to for CLECs to compare Ameritech Illinois systems access with that of Verizon or even Southwestern Bell at this point in time or in the level of detail described in the CLEC comments. Though those companies may share the same "Bell System" technological heritage, they have been under independent management for more than fifteen years. Even systems provided by the same vendor, with the same name and the same business role, have been implemented and administered uniquely under the business direction and strategies of far different management teams. That means that how the data in any two comparable systems may be stored, accessed, backed up, secured and maintained will be very different.

The Ameritech back-end systems that support pre-ordering, ordering, maintenance and repair for both wholesale and retail have not been designed and built to provide "continuous availability". Contrary to CLEC remarks regarding these systems, they in fact do require the equivalent of "care and feeding". Some of those activities required are called Database Re-Organization, Database Image Copies, Database Scrub, Release Upgrades and System Updates. (See definitions and glossary, *infra*.) These functions are vital to the efficient and reliable functioning of Ameritech Illinois' back-end systems, but are also fundamental to most major systems in the information technology industry.

Adding to the complexity of providing extended hours of access in the Ameritech Illinois technical environment is simply the number of functions required (pre-order, order, maintenance & repair) and the multiple systems necessary to fulfill each function. Thus for example, in a repair environment to be completely functional today and to place a case of trouble Ameritech has the following systems operational; a graphical user interface, (EBTA GUI), WFA/C, LMOS, EBTA, and SAM. Each of these systems has a distinct role and function as well as distinct system maintenance, update and maintenance schedule.

To summarize, Ameritech Illinois provides three principle gateways that provide access to multiple functionality's that are each supported by multiple systems. Each of those back-end systems has an independent requirement for maintenance, updating, database scrubs, system hardware and software upgrades etc. When any one of the back-end systems is taken "off-line" some capability is reduced.

The schedule of key back-end systems is provided below:

<u>Weekdays/Saturdays</u>

- The scheduled hours supporting pre-ordering vary from system to system

    - ACIS/ASON   M/F 6am –12am; Sat 7am-7:30pm; Sun none (CST)

    - AEMS   M/F 6am –10pm: Sat 7am-7pm; Sun none

    - SAM   M/F 6am –11pm; Sat 6am-11pm; Sun none

- Most system on-lines (electronic access) are left "up" for extended periods of time. During these extended hours services may be performed, but activities such as back-ups and maintenance functions are performed as required. When these activities are being performed, access to the system may be degraded or interrupted. Electronic access under these conditions is as follows:

- ACIS/ASON   M/F 24 Hours; Sat. until 7:30 PM; Sun after the maintenance.

- AEMS   M/F 22:30 Hours (except 3:00-4:30 for back-ups)

- SAM   M/F 24 Hours, except for maintenance activities

- The <u>scheduled</u> hours supporting ordering vary from system to system.

- ACIS/ASON same as above

- SAM   same as above

- MOR/BRS   M/F 6am-11pm; Sat 8am-5pm Sun none

- EDI Translator   M/F 6am –10pm; Sat 7am-7pm; Sun none

- Release Weekends (exceptions to the schedule above)

    - During release weekends (one weekend per month), system maintenance is minimized to accommodate release supporting activities

- External access (Wholesale & retail available until 7:30pm

- Sun none

- Non-Release Weekends

  - System maintenance activities are performed after the Saturday scheduled hours

  - The number of hours vary by weeks

  - Weekly: Sun 3am-5am

    - Weekly refresh of IMS regions

    - Install any program patches

    - Purges inactive transactions

    Monthly: Sun 1:30am – 5:30am: CPU maintenance (IPL, minor fixes)

    Quarterly: Sat 10mp – Sun 8pm: Storage subsystem maintenance

- Application maintenance performed outside of system maintenance windows

  - Database Re-organizations, image copies, database scrubs

- Schedule of the system's availability following the maintenance window is published and distributed every Friday afternoon.

Maintenance & Repair

With regard to maintenance and repair, contrary to the false claims of the CLECs, Ameritech Illinois has provided electronic access well beyond that being utilized by retail through EBTA (Electronic Bonding Trouble Administration) and an Interactive Voice Response (IVR) system. In the event a CLEC would choose not to use EBTA or the IVR, it could still perform their maintenance & repair functions through calling the Ameritech Illinois Wholesale Local Operations Center which is available twenty-four hours per day seven days per week.

Summary

Extending system access is an extremely complex issue with many interdependencies. It is as completely inappropriate to compare Ameritech Illinois systems to Verizon systems as it would be to compare WorldCom to AT&T. Ameritech Illinois' OSS architecture was not designed for and will not support "continuous availability" (7 x 24) uptime. Ameritech Illinois has significantly expanded system access as a result of previous and current collaboratives and requests from the CLECs. Ameritech Illinois continues to work on the possibility of expanding pre-ordering hours to Sunday and is interested in addressing additional CLEC prioritized requirements as opposed to the "technologically impossible" positioning requirements of 7 x 24.

Definitions:

Data Base Re-Organization (DB Re-Org:)

As updates are made to a database on disk, addition and deletion of records are performed in a portion of the database, which invokes what, may be thought of as supplemental disk space. A new data base record is written to the disk and can be accessed for further review or updating. However, physically, there is not likely to be continuous space on

the disk where the record would be placed logically with other data records (e.g., adding a record in a database organized by telephone number.) Similarly, when a data base record is deleted, it is logically removed and is no longer accessible, but the bytes of data still occupy the same physical location on the disk. When there is an attempt to access a newly added record, the system will first search where it would be sequentially on the disk (e.g., in order by telephone number). If it doesn't find it, the system would then search the supplemental data base areas. While the record would be found, the search will consume more time, which contributes to the elongated 'response time' either a retail rep or CLEC would experience. The data base reorganizations also enable the billing cycle to run more quickly, which facilitates our avoiding the issuance of customer bills.

The Data Base Re-organization physically removes all data which had been logically deleted, and re-constructs the data base to physically sequence all the data base records, which then inserts the newly added records where they should be sequentially located. The supplemental area is then 'cleaned' and ready for the more new records, and performance is enhanced as database reads will locate records in the primary storage area, which now will have all its records in a sequential order. However, as records continue to be added and deleted, this cycle is repeated, and hence data base re-orgs are scheduled on a regular basis.

Data Base Image Copies:

A Data base image copy is the act of copying the information on the database at a point in time to another physical media. This is performed on a regular basis to safeguard against the potential of physical destruction of the media or loss otherwise of the information. The copy can be used then to re-construct the database to the point in time the image

copy was taken. Image copies are also made and stored in other locations to facilitate the ability to recover in the unlikely event that an entire site is destroyed.

Data Base 'Scrub':

A database 'scrub' refers to the use of a coded or utility program to apply appropriate updates to a large number of records (e.g., accounts) on a database. There is often some characteristic in the record that determines if the update should be applied or not. For example, 'scrubs' are used to designate customer accounts as being eligible for the Municipal Infrastructure Maintenance Fee (IMF), as their municipalities enact IMF charges. This scrub program would then update just the records in that particular municipality. If, for instance, there were 100,000 accounts in that municipality, it would take many, many hours for a person to update the appropriate accounts through a terminal updates. The scrub will require far less time, and will be far more accurate in avoiding potential human error in identifying the appropriate accounts and applying the updates. A 'Scrub' requires exclusive use of the database, and is generally scheduled during the weekends to minimize disruption to business processes.

System on-lines:

'On-lines' simply refers to being able to access data base information on an interactive, real-time basis. This relates to both retail access and CLEC access via EDI. On-line then literally means the database is available to be accessed. When system activities occur that require exclusive use of the database (e.g., Data Base Re-org) are being executed, on-line access is unavailable.

Release Implementation Activities:

Releases of the billing software occur once a month. A release will include thirty to eighty change requests that are bundled together into a release. A release will consume between 40,000 and 85,000 hours of work to develop and deploy it. Releases contain a mixture of government-mandated changes, new products, and operational efficiencies. The new products and operational efficiencies in a release may benefit both the retail and CLEC users of the billing systems.

The release installation activities require that the onlines be unavailable for an extended period of time. Once the onlines come down on Saturday evening, the new release components are moved into production and validated. On average, about 2,300 deliverables need to be moved into production and validated. If any of these deliverables are not deployed correctly, it will result in incorrect bills and/or impaired on-lines. At the same time as the components are being moved the data base administrators are updating the structure of the customer records to reflect what is needed for the new functionality. Both of these activities take four and one half-hours on average.

After the two prior tasks are complete, the customer records are "scrubbed" to place the needed new and updated values into the customer records while the onlines are down. This activity takes an average of eight hours per release, depending on the number of conversions, their complexity, and the number of customers impacted.

After the data conversions, "image copies" are taken of the converted data, and the data is reorganized. The copies of the data provide a place to go back to if a severe problem is discovered during validation or running the billing cycles. The reorganization consolidates the data so that it can be accessed quicker, since the release scrub activity would cause significant performance degradations otherwise.

Finally, one hour is allowed for validation of the release install by exercising the functionality to ensure that it does not contain severe defects before starting the next bill

cycle. Validation continues for a total average of four hours in an attempt to find and correct any defects prior to the start of the high volume of activity on Monday. Altogether, the release install activities take an average of 18.5 hours without the on-lines being available. The release install activities have ranged from 14 to 23 hours, depending on the contents of the specific release.

Glossary:

ACIS - Ameritech Customer Information System (Ameritech's billing system)

ASON - Ameritech Service Order Negotiator (Service order entry legacy application)

VAN - Value Added Network (EDI VAN is a means by which businesses can exchange data without direct utilization of the other company's systems. Orders are submitted by CLECs to EDI VANs, which are received by the Ameritech EDI VAN. Firm Order Commitments (FOCs) may be returned through the connection.

EBTA - Electronic Bonding Trouble Administration (Ameritech repair/maintenance interface)

IGS - IBM Global Services (Ameritech's data center operations are managed by IBM's professional operations affiliate)

OSS - Operational Support Systems

AEMS - Ameritech Enterprise Messaging System (CLEC interface for pre-order requests. CLECs may also submit orders through AEMS)

DB Re-Org - Data Base Re-Organization (defined in detail in definition email)

IT - Information Technology

Issues #9, 16, 19, 20, 24, 40: Interface Development Rule: